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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW HAMPSHIRE

In re:

Brian J. Goodman, Sr.,

Debtor

Case No.: 25-10233-KB

Chapter 13

MOTION FOR AUTHORITY TO APPROVE BUY-OUT OF DEBTOR'S INTEREST AND DIRECT PAYMENT OF PROCEEDS TO CHAPTER 13 TRUSTEE (11 U.S.C. §§ 363(b) and 1303)

The Debtor, Brian J. Goodman, Sr., proceeding pro se, respectfully moves this Court for authority to approve a buy-out of the Debtor's economic interest in certain real property and to authorize the direct payment of proceeds to the Chapter 13 Trustee as part of the same closing transaction.

FACTUAL BACKGROUND

- 1. The Debtor commenced this Chapter 13 case on April 11, 2025.
- 2. On January 16, 2026, the Debtor filed an Amended Chapter 13 Plan contemplating a lump-sum payment of \$40,000 to the Chapter 13 Trustee.
- 3. Financing for the buy-out has been approved by RF Boston for Fosterville Properties, LLC, subject only to Court approval. A copy of the lender letter is attached as Exhibit A.
- 4. At closing, the closing agent will issue a separate check in the amount of \$40,000 payable directly to the Chapter 13 Trustee as part of the same transaction, ensuring immediate funding of the Chapter 13 plan without funds passing through the Debtor.

RELIEF REQUESTED

5. Pursuant to 11 U.S.C. §§ 363(b) and 1303, the Debtor requests authority to approve the buy-out and authorize the closing agent to disburse \$40,000 directly to the Chapter 13 Trustee.

CONCLUSION

WHEREFORE, the Debtor respectfully requests entry of an order approving the buy-out transaction and authorizing direct payment to the Chapter 13 Trustee.

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Date: January 20, 2026

Brian J. Goodman, Sr.

Debtor Pro Se

EXHIBIT A



January 16, 2026

Borrower: Fosterville Properties, LLC

Property Address: 33-35 Pinecrest Cir, Concord, New Hampshire

Re: Confirmation of loan approval

To whom it may concern,

This letter serves as confirmation that RF Boston has approved a loan for the sale/ buyout secured by the above-referenced property. The borrower will be Fosterville Properties LLC, which to the best of our knowledge is a single-member LLC held by Dana Crowe.

Final funding of the loan is conditioned upon receipt of required court approval of the transaction.

Please feel free to contact me directly with any questions or requests for additional information.

Sincerely,

Bryan Joyce | 207.752.0107 | bryan@rf-boston.com

Commercial Lending Director

Bryan Joyce

RF Boston | Real Estate Private Lending

RF Boston.com

155 Fleet Street, Portsmouth, NH 03801

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW HAMPSHIRE

In re:

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Case No.: 25-10233-KB

Chapter 13

NOTICE OF MOTION AND OPPORTUNITY TO OBJECT

PLEASE TAKE NOTICE that the Debtor has filed an Updated Motion for Authority to Approve Buy-Out of Debtor's Interest and Direct Payment of Proceeds to the Chapter 13 Trustee pursuant to 11 U.S.C. §§ 363(b) and 1303.

The Motion seeks authority for the closing agent to issue a separate check in the amount of \$40,000 payable directly to the Chapter 13 Trustee as part of the same closing transaction.

Any objection to the relief requested must be filed with the Court and served on the Debtor within fourteen (14) days of the date of service of this Notice.

If no timely objection is filed, the Court may grant the Motion without further notice or hearing.

Date: January 20, 2026

Brian J. Goodman, Sr.

Debtor Pro Se

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW HAMPSHIRE

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Debtor

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Chapter 13

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2026, I served a true and correct copy of the following documents in the above-captioned case:

- Updated Motion for Authority to Approve Buy-Out of Debtor's Interest and Direct Payment of Proceeds to the Chapter 13 Trustee
- Updated Notice of Motion and Opportunity to Object
- Exhibit A (Lender Letter)
- Proposed Order Approving Buy-Out and Direct Payment of Proceeds to the Chapter 13 Trustee

Service was made by first-class United States mail, postage prepaid, upon all creditors and parties in interest at the addresses listed on the Court's official mailing matrix.

I further certify that I am not registered for CM/ECF electronic filing or service and that all service was therefore completed by U.S. mail. I am filing the above-referenced documents and this Certificate of Service in person at the Clerk's Office.

I declare under penalty of perjury that the foregoing is true and correct.

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Date: January 20, 2026

Brian J. Goodman, Sr.

Debtor Pro Se